

COURT FILE NUMBER **Q.B. No. 1401 of 2019**

COURT OF QUEEN'S BENCH FOR SASKATCHEWAN

JUDICIAL CENTRE **SASKATOON**

APPLICANT **HARMON INTERNATIONAL**
(ORIGINAL RESPONDENT) **INDUSTRIES INC.**

RESPONDENT **PILLAR CAPITAL CORP.**
(ORIGINAL APPLICANT)

Clerk's Stamp

**IN THE MATTER OF THE RECEIVERSHIP OF HARMON INTERNATIONAL
INDUSTRIES INC.**

AFFIDAVIT OF CALVIN MONEO

I, CALVIN MONEO, of Saskatoon, Saskatchewan MAKE OATH AND SAY:

1. I am a director, officer and shareholder of the Applicant, Harmon International Industries Inc., ("Harmon"). I have reviewed the files and records of Harmon in relation to this matter, as well as spoken about this matter to other officers and directors of Harmon. As such, I have personal knowledge of the facts and matters deposed to herein, except where stated to be based on information and belief, where so stated, I verily believe the same to be true.
2. I have reviewed the Affidavit of Steven Dizep sworn September 30, 2019, the Affidavit of Steven Dizep sworn January 7, 2020, the Affidavit of Keaton O'Brien sworn January 7, 2020, the First Report of the Receiver dated May 27, 2020, the Second Report of the Receiver dated July 17, 2020, and the Third Report of the Receiver dated July 29, 2020. Based on my review of these documents I am unable to determine the amount Pillar Capital Corp. ("Pillar") claims to be owed and on what basis Pillar has calculated the amounts it has claimed in these proceedings.
3. I have reviewed an email sent by counsel for Harmon International Industries Inc. ("Harmon") to counsel for Pillar, dated September 3, 2020 (the "September 3 Email"), requesting a statement of Harmon's indebtedness to Pillar. To date, counsel for Harmon

has not received a reply. A copy of the September 3 Email is attached hereto and marked as Exhibit "A" to this my affidavit.

4. During the past week I have had discussions with two parties with respect to arranging for a purchase and assignment of Pillar's security that would pay out Pillar in full, but in order to make further progress in this regard Harmon will require an accurate accounting of the mortgage loan account with Pillar.
5. I therefore make this affidavit in support of Harmon's application for the relief set out in the Draft Order.

SWORN BEFORE ME at Saskatoon)
Saskatchewan, this 8th day of September,)
2020.)


_____)

A COMMISSIONER FOR OATHS
for Saskatchewan
Being a Solicitor



CALVIN MONEO

CONTACT INFORMATION AND ADDRESS FOR SERVICE

Leland Kimpinski LLP
Lawyer in charge of file: Ryan A. Pederson
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The Proposed Plaintiff's address for service is as above.

Ryan Pederson

From: Ryan Pederson
Sent: September-03-20 7:26 PM
To: Mike Russell
Cc: Kevin Hoy
Subject: Pillar Capital Corp v Harmon International Industries Inc

Mike,

As counsel for Harmon International Industries Inc., I am writing to request a statement setting out Harmon's indebtedness to your client as of today's date, including a breakdown of principal, interest and other fees or charges added to the account.

Ryan Pederson

This is Exhibit "A" to the affidavit
of Calvin Moneo
sworn before me this 8 day
of September, 2020


A Commissioner for Oaths
for Saskatchewan
Being a Solicitor